



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

VIA FEDERAL EXPRESS

May 23, 2016

EPA CERCLA Section 104(e) Request for Information

Onnick Mehrabian, President
Cars911.com
2244 N. San Fernando Rd.
Los Angeles, CA 90065

Re: Information Request Letter for the Pollock Operable Unit
Los Angeles, California

Dear Mr. Mehrabian:

The United States Environmental Protection Agency ("EPA") is spending public funds to investigate and respond to actual or threatened releases of hazardous substances, pollutants, and contaminants at the San Fernando Valley (Area 4) Superfund Site, Pollock Operable Unit ("POU" or "the Site"), located in Los Angeles County, California. This letter seeks your cooperation in providing information and documents relating to contamination underlying all or portions of Los Angeles, California. This request is for information you may have pertaining to Cars911.com's ("the Company") facility currently located at 2110 N. San Fernando Rd., Los Angeles, California ("the Facility").

EPA believes that the Company may have information that will assist the California Regional Water Quality Control Board ("RWQCB") and EPA in their investigation of the Site, especially with regard to trichloroethylene ("TCE"), tetrachloroethylene ("PCE"), 1,4-dioxane, chromium and hexavalent chromium. EPA requests that the Company answer the questions contained in Enclosure B. Definitions and instructions on how to respond to the questions are provided in Enclosure A.

Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. §9604(e), EPA has broad information-gathering authority which allows EPA to require persons to furnish information or documents relating to:

(A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.

(B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.

(C) Information relating to the ability of a person to pay for or perform a cleanup.

Please note that the Company's compliance with this information request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5). This statutory provision authorizes EPA to seek the imposition of penalties of up to \$37,500 per day of noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001. The information the Company provides may be used by EPA in administrative, civil, or criminal proceedings.

Some of the information EPA is requesting may be considered by the Company to be confidential business information (CBI), as described in Title 40 of the Code of Federal Regulations, Subchapter A, Part 2, Subpart B (40 C.F.R., §2.201, *et seq.*). Please be aware that the Company may not withhold information upon that basis. If the Company wishes EPA to treat the information confidentially, it must advise EPA of that fact by following the procedures outlined in Enclosure A, including the requirement for supporting its claim for confidentiality. Please be aware that EPA will maintain information consistent with the Privacy Act of 1974, 5 U.S.C. §552a, as amended.

This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See also, 5 C.F.R. §§1320.3(c), 1320.4, and 1320.6(a).


We encourage the Company to give this matter its immediate attention and request that it provide a complete and truthful response to this information request within thirty (30) calendar days of its receipt of this letter. EPA is committed to moving forward with its investigation, and extensions of time for responses will only be granted upon a showing of good cause. If the Company anticipates that it will need an extension, please request one as soon as possible. Requests for extensions made at or near the due date will not be viewed favorably by EPA. The Company's response to this letter should be made in writing and signed by you or a duly authorized representative of the Company. If some or all of the requested information has previously been provided to EPA, the Company may incorporate that information by referencing the date of the earlier response and the information contained therein that is responsive to the current information request.

The Company's response should include the appropriate name, address, and telephone number of the person to whom EPA should direct future correspondence in regard to this information request. The Company's response to the information request should be directed to:

Kathi Moore, Manager
CERCLA Enforcement Section
Superfund Division
U.S. EPA, Region 9
75 Hawthorne St.
San Francisco, CA 94105

If the Company has any questions regarding this letter or the Site's cleanup status, it should contact the Remedial Project Manager, Lynn Keller, at (415) 947-4162 or keller.lynn@epa.gov. Questions regarding legal matters can be directed to the Site Attorney, Michael Massey, at (415) 972-3034 or massey.michael@epa.gov. Thank you for your prompt attention to this matter.

Sincerely,


Kathi Moore, Manager
CERCLA Enforcement Section
Superfund Division

Enclosures (2)

ENCLOSURE A: INSTRUCTIONS AND DEFINITIONS

Instructions:

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this information request. For each question contained in this letter, if information responsive to this information request is not in the Company's possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. When answering the questions in Enclosure B, please precede each answer with the corresponding number of the question and subpart to which it responds.
3. Number Each Document. For each document produced in response to this information request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
4. Provide the Best Information Available. Provide responses to the best of the Company's ability, even if the information sought was never put down in writing or if the written documents are no longer available. The Company should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available will be considered non-compliance with this information request.
5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that the Company relied on in producing its answer.
6. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this information request become known or available to the Company after it responds to this information request, EPA hereby requests pursuant to CERCLA Section 104(e) that the Company supplement its response to EPA.
7. Scope of Request. The scope of this request includes all information and documents independently developed or obtained by research on the part of the Company, its attorneys and consultants or any of their agents, consultants, or employees.
8. Personal Privacy Information. The information requested herein must be provided even if the Company or an individual contends that it includes information considered to be of a personal, private nature, e.g., home addresses, home or personal mobile telephone numbers, social security numbers, personal financial information, etc. Because all of the information that you provide in response to this request could be requested by a third party pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 et seq., your assistance is valuable in identifying all information that you consider to be personal privacy information so that EPA can protect it, pursuant to 40 CFR Section 2.105(6), from disclosure to the public. Accordingly, please clearly identify all personal privacy information in your response by either: (a) typing or stamping "PERSONAL PRIVACY" on each page

containing such information; or (b) attaching a cover sheet to each page containing such information and identifying the information considered to be of a personal, private nature. In addition, please provide both a redacted and unredacted version of each page of your response that contains personal privacy information.

9. Claiming Confidential Business Information. The information requested herein must be provided even if the Company contends that all or part of the information requested is trade secret or confidential commercial or financial information (“Confidential Business Information” or CBI”).¹ The Company may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203. If no claim of confidentiality accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to the Company. Information covered by a CBI claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). To notify EPA of your claim that a document or response contains Confidential Business Information:
- a) At the time of submittal, prominently stamp or type one of the following on each page containing information that you allege is entitled to confidential treatment: “TRADE SECRET,” “PROPRIETARY,” or “COMPANY CONFIDENTIAL.”
 - b) In the alternative, at the time of submittal, attach a cover sheet to each page containing information that you allege is entitled to confidential treatment that says one of the following: “TRADE SECRET,” “PROPRIETARY,” or “COMPANY CONFIDENTIAL.”
 - c) Provide both redacted and unredacted copies of any material (both attachments and narrative responses) you are claiming as CBI; this is particularly important in order to clearly identify confidential portions of otherwise non-confidential documents. Both the redacted and unredacted version of each page that you allege contains CBI should be marked as “TRADE SECRET,” “PROPRIETARY,” “COMPANY CONFIDENTIAL.”
 - d) Notice to EPA of your CBI claims may take a form different from those identified in (a) and (b) above, but EPA strongly encourages you to contact the EPA Site Attorney prior to submitting your request in order to ensure that your alternative form of notice identifies all information you are claiming as CBI in a consistent and conspicuous manner.
10. Proving Confidential Business Information Claims. If the Company makes a CBI claim for any of the information it submits, it must be prepared to satisfy the criteria set forth in 40

¹ The regulations governing claims of Confidential Business Information can be found in Part 2, Subpart B of Title 40 of the Code of Federal Regulations and in Volume 41 of the Federal Register, at page 36902, September 1, 1976, as amended at Volume 43 of the Federal Register at page 40000, September 8, 1978; Volume 50 of the Federal Register at page 51661, December 18, 1985.

CFR Part 2.208 upon request by EPA. In order to prove a CBI claim the company will have to:

- a) Provide a detailed explanation of the substantial harmful effects to the Company's competitive position that would result from disclosure of each specific piece of information that you allege is entitled to confidential treatment. The explanation must include what the harmful effects would be, why they should be viewed as substantial, and what the causal relationship is between disclosure and such harmful effects.
 - b) Identify the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
 - c) Identify measures taken by the Company to guard against the undesired disclosure of the information to others and measures it intends to take in the future to protect against disclosure;
 - d) Explain the extent to which the information has been disclosed to others, and the precautions taken in connection therewith, and whether the information has been obtainable by legitimate means without the Company's consent; and
 - e) Provide pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available.
11. Disclosure to EPA's Authorized Representatives. Information that the Company submits in response to this information request may be disclosed by EPA to authorized representatives of the United States pursuant to 40 C.F.R. §2.310(h) even if the Company asserts that all or part of it is confidential business information. The authorized representatives of EPA to which EPA may disclose information contained in the Company's response are as follows:

Department of Toxic Substances Control/California
Environmental Protection Agency

Toeroek Associates, Inc.
EPA Contract Number EP-BPA-11-W-001

Toeroek Herndon Joint Venture
EPA Contract Number EP-R9-12-02

Oneida Total Integrated Enterprises (OTIE)
EPA Site Specific RAC Contract Number EP-S9-13-01

Any subsequent additions or changes in EPA contractors who may have access to the Company's response to this information request will be published in the Federal Register.

This information may be made available to these authorized representatives of EPA for any of the following reasons: to assist with document handling, inventory, and indexing; or to

assist with document review and analysis for verification of completeness; or to provide expert technical review of the contents of the response. Pursuant to 40 C.F.R. §2.310(h), the Company may submit comments on EPA's potential disclosure of any confidential information to its authorized representatives within the thirty (30) calendar day period in which the response is due.

12. Objections to Questions. If the Company has objections to some or all of the questions contained in the information request, it is still required to respond to each of the questions.

Definitions Applicable to Enclosure B, Information Request:

1. Any reference to “**Cars911.com**”, or the “**Company**” should be interpreted to include, but not be limited to, all officers, managers, employees, contractors, assigns, agents, trustees, predecessors, successors, subsidiaries, operating divisions, affiliates, and branches.
2. The term “**person**” shall include any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.
3. The term “**waste**” or “**wastes**” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge.
4. The term “**hazardous waste**” shall have the same definition as that contained in Section 1004(5) of RCRA.
5. The term “**hazardous substance**” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
6. The term “**release**” has the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
7. The term “**pollutant or contaminant**” shall have the same definition as that contained in Section 101(33) of CERCLA and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.
8. The term “**materials**” shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Facility including, but not limited to, all hazardous substances, pollutants or contaminants.
9. The term “**documents**” includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

10. The term “**Facility**” should be interpreted to include the entire property defined or any discrete portion thereof. If the Company’s answer refers only to a discrete portion of the Facility, it should specify which portion is being referred to.
11. Undefined **Terms**. All terms not defined herein shall have their ordinary meaning unless such terms are defined in CERCLA, 42 U.S.C. §§ 9601 et seq., in which case the statutory definitions shall apply.

ENCLOSURE B: INFORMATION REQUEST

- 1) State the full legal name, address, telephone number, position(s) held by, and tenure of the individual(s) answering any of the questions below on behalf of Cars911.com (the “Company”).
- 2) Identify all individuals who are or were responsible for environmental matters at the Company’s facility located at 2110 N. San Fernando Rd., Los Angeles, California (the “Facility”). Henceforth, the term “Facility” shall be interpreted to include both the real property at 2110 N. San Fernando Rd. and any improvement thereto. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates each individual held such position.
- 3) Explain the Company’s present operational status (e.g., active, suspended, defunct, merged, or dissolved).
- 4) Provide the date the Company was incorporated, formed, or organized. Identify the State in which the Company was incorporated, formed, or organized.
- 5) Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates.
- 6) Identify all former business structures under which the Company existed or operated and for each, identify:
 - a) the corresponding dates that it existed or operated under that business structure; and
 - b) the name(s) it used.
- 7) Provide a copy of the articles of incorporation, partnership agreement, articles of organization, or any other documentation (together with any amendments) demonstrating the particular business structure under which the Company has existed or operated since its inception.
- 8) If the Company is operating or has operated under a fictitious business name, identify the fictitious name and the owner(s) of the fictitious name, and provide a copy of the Fictitious Business Name Statement filed with the county in which the Company is or was doing business.
- 9) Identify and explain any and all sales of the Company’s assets if the sale represented a sale of substantially all of the Company’s assets.
- 10) Identify and explain any investments by the Company in other businesses, companies, or corporations equating to 5 percent or more of that other business, company, or corporation from the formation of the Company to the present.

- 11) If the Company is the current operator of the Facility, identify all owners of the Facility during the time that the Company (in its current or any former business structures) has operated at the Facility.
- 12) Identify any periods of time during which the Company has owned the Facility or any portion of the Facility.
- 13) If the Company is the current operator of the Facility, did you operate the Facility or any portion of the Facility during or after the disposal or placement of hazardous substances on, or at the Facility? Describe all of the facts on which you base the answer to this question.
- 14) During the time you have operated the Facility, have you known or had reason to know that any hazardous substance have been disposed of on or at the Facility?
- 15) Provide copies of all investigations of the Facility you undertook prior to operating the Facility.
- 16) Identify all prior or subsequent operators of the Facility, including lessors, of the Facility. For each such operator, further identify:
 - a) The dates of operation;
 - b) The nature of prior operations at the Facility;
 - c) All evidence that they controlled access to the Facility; and
 - d) All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Facility and/or its solid waste units during the period that they were operating the Facility.
- 17) Provide the dates that the Company, under any of its current or former business structures, operated at the Facility.
- 18) Provide a map showing the layout of the Facility and include:
 - a) Dates each structure/building at the Facility was constructed;
 - b) Dates when the Company operated in each structure/building; and
 - c) Description of the operations that occurred in each structure/building.
- 19) For any period of time in which the Company, under any of its current or former business structures, operated at the Facility, provide the name, address, and phone number of the Facility's owner. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to the real property owner during the Company's occupancy of the Facility.
- 20) Describe the nature of the Company's activities or business at the Facility, with respect to purchasing, receiving, processing, storing, treating, disposing, or otherwise handling hazardous substances or materials containing trichloroethylene ("TCE"),

tetrachloroethylene ("PCE"), 1, 4-dioxane, chromium or hexavalent chromium at the Facility.

- 21) Did the Company ever use, purchase, generate, store, treat, dispose, or otherwise handle at the Facility any hazardous substances containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium? If the answer is anything but an unqualified "no," identify:
- a) In general terms, the nature and quantity of the hazardous substances containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium transported, used, purchased, generated, stored, treated, disposed, or otherwise handled.
 - b) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium transported, used, purchased, generated, stored, treated, disposed, or otherwise handled.
 - c) The persons who supplied you with each such hazardous substance containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium.
 - d) How each such hazardous substance containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
 - e) When each such hazardous substance containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium was used (include the start and end date of such use), purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
 - f) Where each such hazardous substance containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
 - g) The quantity of each such hazardous substance containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
- 22) Provide a complete list of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Facility during any or all of the period of time that the Company operated at or was otherwise associated with the Facility. For each employee listed, provide the following information:
- a) The employee's full name;
 - b) The employee's current or last known address and telephone number, including the last known date on which you believe each address and telephone number was current;
 - c) The dates that the employee worked at the Facility;
 - d) The position(s) the employee held under any of the Company's business structures; and
 - e) The employee's job title(s) and the corresponding dates during which the Company believes that the employee would have had knowledge of the use and disposal of wastes.

- 23) Identify all federal, state and local authorities that regulated the Facility operator and/or that interacted with the Facility operator with respect to environmental and health and safety issues.
- 24) Provide a list of all local, state, and federal environmental permits granted for the Facility or any part thereof (e.g., RCRA permits, NPDES permits, etc.).
- 25) Did the Facility ever file a Hazardous Waste Activity Notification under the Resource Conservation and Recovery Act ("RCRA")? If yes, provide a copy of such notification.
- 26) Did the Facility ever have "interim status" under RCRA? If yes, and the Facility does not currently have "interim status," describe the circumstances under which the Facility lost "interim status."
- 27) Identify and provide all documents related to all violations, citations, and deficiencies issued by any federal, state, or local authorities concerning environmental and health and safety issues at the Facility.
- 28) Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and the product(s) manufactured or services performed by the Company at the Facility. Describe any significant change in Facility size, the number of employees, or the products manufactured over time.
- 29) Provide all maps and drawings of the Facility, including a scaled map showing the following:
 - a) Property boundaries, including a written legal description;
 - b) Underground utilities (telephone, electrical, sewer, water main, etc.);
 - c) Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);
 - d) Maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks.
 - e) Surface structures (e.g., buildings, tanks, etc.);
 - f) Groundwater and dry wells;
 - g) Storm water drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s), and other underground structures; and
 - h) Waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, burn pits, waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.
- 30) For 29 (a) through (h), provide the following information:
 - a) The type of utility, structure, well, drainage/sewer system, or waste storage/accumulation area;
 - b) Whether the utility, structure, well, drainage/sewer system, or waste storage/accumulation area is currently in operation;

- c) The dates that the utility, structure, well, drainage/sewer system, or waste storage/accumulation area was in use;
 - d) The purpose and past usage of the utility, structure, well, drainage/sewer system, or waste storage/accumulation area (e.g., storage, spill containment, etc.);
 - e) The quantity and types of materials (hazardous substances and any other chemicals) handled, used, stored, disposed of in or at each utility, structure, well, drainage/sewer system, or waste storage/accumulation area;
 - f) For groundwater and dry wells identified pursuant to request 29(f), provide drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);
 - g) For storm water drainage and sanitary sewer systems identified pursuant to request 29(g), explain when and how such systems are or were emptied; and
 - h) Describe any and all additions, demolitions, or changes of any kind on, under or about the Facility, its physical structures or to the property itself (e.g., excavation work); and any planned additions, demolitions or other changes to the Facility;
- 31) Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Facility, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, groundwater sampling, and air quality.
- 32) Identify all leaks, spills, or releases into the environment of any hazardous substances, pollutants, or contaminants containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium that have occurred at or from the Facility. In addition, identify:
- a) When such releases occurred;
 - b) How the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated).
 - c) The amount of each hazardous substances, pollutants, or contaminants so released;
 - d) Where such releases occurred;
 - e) Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release.
 - f) Any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken; and
 - g) All persons with information relating to these releases.
- 33) Was there ever a spill, leak, release or discharge of hazardous substances containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium into any subsurface disposal system or floor drain inside or under any buildings located at the Facility? If the answer to this question is anything but an unqualified “no,” identify:
- a) Where the disposal system or floor drains were located;

- b) When the disposal system or floor drains were installed;
 - c) Whether the disposal system or floor drains were connected to pipes;
 - d) Where such pipes were located and emptied;
 - e) When such pipes were installed;
 - f) How and when such pipes were replaced, or repaired; and
 - g) Whether such pipes ever leaked or in any way released hazardous substances into the environment.
- 34) Has any contaminated soil ever been excavated or removed from the Facility? Unless the answer to this question is anything besides an unequivocal “no,” identify:
- a) Amount of soil excavated;
 - b) Location of excavation;
 - c) Manner and place of disposal and/or storage of excavated soil;
 - d) Dates of soil excavation;
 - e) Identity of persons who excavated or removed the soil;
 - f) Reason for soil excavation;
 - g) Whether the excavation or removed soil contained hazardous substances and why the soil contained such substances;
 - h) All analyses or tests and results of analyses of the soil that was removed from the Facility;
 - i) All persons, including contractors, with information about (a) through (h) of this request.
- 35) Describe the acts or omissions of any persons other than your employees, agents or those persons with whom you had a contractual relationship, that may have caused the release or threat of release of hazardous substances at the Facility and damages relating therefrom and identify such persons.
- 36) Provide copies of hazardous material business plans and chemical inventory forms (originals and updates) submitted to city, county, and state agencies.
- 37) Provide a list of all chemicals and hazardous substances containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium used at the Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets (or “Safety Data Sheets”) for all hazardous substances used.
- 38) Identify and provide the information below for all volatile organic compounds (most notably PCE and TCE); total and hexavalent chromium; and 1,4-dioxane that are or were used at, or transported to, the Facility:
- a) The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product;
 - b) The location(s) where each chemical or hazardous substance is or was used, stored, and disposed of;

- c) The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
 - d) The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and
 - e) The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances.
- 39) If any substance containing chromium as a component (“chromium-related substances”) was utilized in any of the Company’s operations at the Facility, provide a complete description of those operations. Indicate the approximate volume of chromium or chromium-related substances used per month at the Facility, the dates chromium or chromium-related substances were used, and the storage and disposal practices in effect during the Company’s operations at the Facility for materials containing chromium. Include documentation evidencing the Company’s use of chromium or chromium-related substances.
- 40) Identify, and provide the following information for, all groundwater wells that are located at the Facility:
- a) Date the Facility groundwater wells were last sampled;
 - b) List of all constituents which were analyzed during groundwater sampling events; and
 - c) All groundwater sampling results, reports of findings, and analytical data.
- 41) Identify all insurance policies held by the Company from the time it commenced operations at the Facility until the present. Provide the name and address of each insurer, the policy number, the amount of coverage and policy limits, the type of policy, and the expiration date of each policy. Include all comprehensive general liability policies and “first party” property insurance policies and all environmental impairment insurance. Provide a complete copy of each policy.
- 42) Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Facility concerning insurance issues.
- 43) Provide copies of any applications for permits or permits received under any local, state, or federal environmental laws and regulations, including any waste discharge permits, such as national pollutant discharge elimination system permits.
- 44) If the Company discharged any of its waste stream to the sewer at the Facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.
- 45) For each waste stream generated at the Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.

- 46) Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Facility prior to transport to a disposal site.
- 47) Please describe the method used by the Company to remove waste streams from sumps at the Facility.
- 48) Please identify all wastes that were stored at the Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.
- 49) Please identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium that have occurred at or from the Facility. In addition, identify and provide supporting documentation of:
 - a) The date each release occurred;
 - b) The cause of each release;
 - c) The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
 - d) Where each release occurred and what areas were impacted by the release; and
 - e) Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.
- 50) Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.



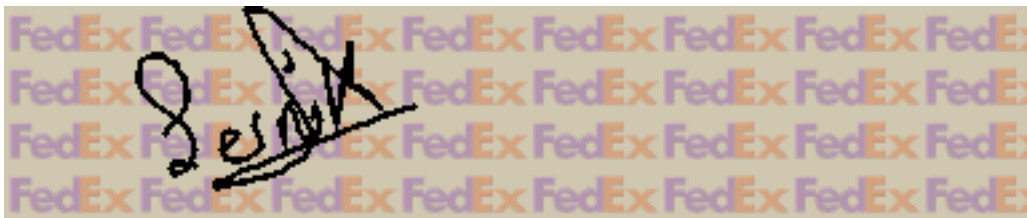
May 26,2016

Dear Customer:

The following is the proof-of-delivery for tracking number **631423804233**.

Delivery Information:

| | | | |
|--------------------------|--|---------------------------|---|
| Status: | Delivered | Delivered to: | Receptionist/Front Desk |
| Signed for by: | K.LEE | Delivery location: | 2244 N SAN FERNANDO RD LOS ANGELES, CA 90065 |
| Service type: | FedEx Priority Overnight | Delivery date: | May 24, 2016 09:07 |
| Special Handling: | Deliver Weekday Direct Signature Required | | |



Shipping Information:

| | | | |
|-------------------------|--------------|-------------------|----------------|
| Tracking number: | 631423804233 | Ship date: | May 23, 2016 |
| | | Weight: | 0.5 lbs/0.2 kg |

Recipient:

Onnick Mehrabian
Cars911.com
2244 N. San Fernando Rd.
LOS ANGELES, CA 90065 US

Reference**Shipper:**

Pollock Task Order
Toeroek Associates, Inc.
1300 Clay Street
Suite 450
Oakland, CA 94612 US
9260-006

Thank you for choosing FedEx.